

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

TIMOTHY H. EDGAR, *et al.*,

Plaintiffs,

v.

DANIEL COATS, Director of National  
Intelligence, *et al.*,

Defendants.

Civil Action No. 8:19-cv-00985 (GJH)

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND  
TO COMPLAINT AND TO ENTER STIPULATED BRIEFING SCHEDULE**

Defendants Daniel Coats, Director of National Intelligence, Gina Haspel, Director of the Central Intelligence Agency, Patrick M. Shanahan, Acting Secretary of Defense, and Paul M. Nakasone, Director of the National Security Agency (collectively, “Defendants”), by and through their undersigned counsel, respectfully move for a 7-day extension of time, through and including June 14, 2019, to respond to Plaintiff’s Complaint. By Defendants’ calculation, their response to the Complaint is currently due on June 7, 2019. Defendants are requesting the extension due to a misunderstanding about the date on which the U.S. Attorney was served with the Complaint and summons in this case, and to accommodate the press of business in other cases being handled by the undersigned counsel. Defendants have not previously requested an extension of the deadline to file their response to the Complaint.

The undersigned counsel has conferred with counsel for Plaintiffs. Plaintiffs consent to the requested extension, and the parties have stipulated to the following briefing schedule to govern Defendants’ anticipated motion to dismiss pursuant to Fed. R. Civ. P. 12:

- June 14, 2019: Defendants' motion to dismiss.
- July 16, 2019: Plaintiffs' opposition to Defendants' motion to dismiss.
- August 2, 2019: Defendants' reply brief.

Defendants respectfully request that the Court grant their consent motion for an extension of time and enter the parties' stipulated briefing schedule. A proposed order accompanies this motion.

Dated: May 31, 2019

Respectfully Submitted,

ROBERT K. HUR  
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/s/ Neil R. White  
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